

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF)
EDUCATORS, BARBARA PHILLIPS,)
JAMES THOMAS, DAWN ZIMMERER,) Civil No. 3:25-cv-00417-HTW-LGI
L.E. JIBOL, UNITED CAMPUS WORKERS)
SOUTHEAST LOCAL 3821, MADISYN)
DONLEY, ALEXIS COBBS, KAREN)
ADERER, FOSTERING LGBTQ+)
ADVOCACY, RESOURCES,)
ENVIRONMENTS AND WOMEN IN)
SCIENCE AND ENGINEERING,)
)

Plaintiffs,

v.

BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER LEARNING,
MISSISSIPPI COMMUNITY COLLEGE
BOARD, MISSISSIPPI STATE BOARD OF
EDUCATION, MISSISSIPPI CHARTER
SCHOOL AUTHORIZER BOARD,

Defendants.

DECLARATION OF DAWN ZIMMERER

Pursuant to 28 U.S.C. § 1746, I, Dawn Zimmerer, make the following declaration under penalty of perjury:

1. My name is Dawn Zimmerer. My place of residence is Clinton, Mississippi. I have been a resident of Hinds County and the state of Mississippi for five years.
2. I am an Administrative Librarian at with McLendon Library at Hinds Community College in Raymond, Mississippi and I have worked at Hinds Community College for 22 months. I am the staff sponsor of the Gay Straight Alliance student organization. My degree is a Masters in Library Science from Southern Connecticut State University.


3. Many of the concepts banned by HB 1193 are essential to supporting students and maintaining materials in McLendon Library. I consider these tasks integral to my jobs as a librarian and would like to continue to do them.
4. My work is impacted by the following sections of HB 1193: 3(b), 3(i), and 3(f). McLendon Library maintains, and I often direct students to, books and other resources that are available for circulation that “increase awareness or understanding of issues related to race, sex, color, gender identity, sexual orientation or national origin,” as prohibited by Section 3(b), that could be construed as relating to the “divisive concepts” prohibited by 3(b) and 3(i), and that could be construed as “promot[ing]” or “endors[ing]” certain other concepts or any “related formulation of those concepts,” as encompassed in Section 3(f).
5. As of 2024, the McLendon Library had in its collection: 93,286 books; 7,630 audiovisual resources; and 327,970 eBooks. The Library usually adds around 2,000 books per year to the total. I would be in charge of any required cull of library resources or monitoring any required restrictions on collection development. To promote books and reading, the Library often displays books around themes, such as Black History Month, Women’s History Month, and Latin American History Month. I arrange these displays.
6. I am afraid that by performing my duties as a librarian, I will face consequences under the law. I would be afraid to recommend anything to students in case the material is controversial or divisive, though I believe I have a professional responsibility to do so and have the right as a part of my rights to free speech.
7. These provisions are so broad and vague that it is unclear what I can and cannot do. Many provisions of the act are vague, confusing, and inconsistent, and make it difficult for librarians like me to differentiate what is prohibited from what is allowed. I am uncertain as to which of my actions will violate the provisions of the act and am concerned that the actions I take as an educator and administrator will later be held against me and that I will be

disciplined or terminated for saying and doing things that are protected as part of my right to free speech.

8. All of this harms librarians. It discourages and chills our speech, and it prevents us from hearing certain prohibited speech, in a way that prevents us from exercising their rights under the First and Fourteenth Amendments.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 17, 2025



(WITNESS)